

REMARKS

The above preliminary amendments and following remarks are submitted in accordance with a Request for Continued Examination filed on even date and in response to the Final Official Action of the Examiner mailed on April 7, 2005. Having addressed all objections and grounds of rejection, claims 1-25, being all the pending claims, are now deemed in condition for allowance. Entry of this amendment and reconsideration to that end is respectfully requested.

The Examiner has objected to the specification as containing "hyperlinks and/or other form of browser-executable code". This ground of objection is respectfully traversed. Though page 34 contains examples of the format of potential hyperlinks, it does not contain any specific hyperlinks or other form of browser-executable code. As previously stated, Applicants do not object to amending the specification in a reasonable fashion if recommended by the Examiner. However, they are concerned that such modifications do not detract from the totality of the disclosure of the preferred modes of practicing Applicants' invention.

Claims 1-25 have been rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,366,934, issued to Cheng et al (hereinafter referred to as "Cheng") in view of U.S. Patent No. 6,810,429, issued to Walsh et al (hereinafter referred

to as "Walsh"). This ground of rejection is respectfully traversed as to amended claims 1-25 for failure of the Examiner to present a *prima facie* case of obviousness as required by MPEP 2143.

To meet his burden under MPEP 2143, the Examiner must present evidence of three elements: 1) motivation to make the alleged combination; 2) reasonable likelihood of success of the alleged combination; and 3) presence of all claim elements within the alleged combination. As explained in detail below, the Examiner has not met his obligation.

In alleging "motivation", the Examiner states:

It would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified Cheng et al. by the teaching of Walsh et al. because providing in a format (sic) incompatible with XML via a publicly accessible digital data communication network allows integration of various computer systems in an enterprise as taught by Walsh et al. (Walsh et al. col 2, lines 56-67).

This statement is not only clearly erroneous, it flies in the face of the specific objectives of Cheng, which is solely directed to handling XML documents within a single computer (it is respectfully submitted that any reading of the Summary of the Invention of Cheng compels this conclusion). It defies logic that one would cause a computer to communicate with itself via the claimed "publicly accessible digital data communication network" using a format "incompatible with XML" to internally handle XML documents as disclosed by Cheng.

Again, having been previously reminded of his burden of proof with regard to "reasonable likelihood of success" of the alleged combination, the Examiner simply ignores this obligation. It is assumed that the Examiner has failed to provide this proof, because he cannot. Cheng is solely dedicated to queries of, access to, storing of, etc. XML documents (see Cheng). Cheng would not and could not work with a non-XML data base.

Furthermore, the alleged combination does not have all of the claimed elements. With regard to claim 1, for example, the alleged combination does not have the claimed "XML mapping tree that corresponds to said DTD and which defines the transformation of each of said plurality of elements mapped for use by said data base management system for entry into said data base". The reason that Cheng does not have this "XML mapping tree" is because the data base of Cheng stores XML documents. Surely the Examiner can distinguish this from the claimed invention which does not store XML documents in its data base. Because it does not store XML documents in its data base, the claimed invention needs an "XML mapping tree" to map the received XML document into its data base which does not store XML documents. Cheng, on the other hand, stores XML documents in its data base. Therefore, it only need use the DTD for completing the storage process, as cited by the Examiner.

The rejection of claim 1, and all claims depending therefrom, is respectfully traversed because the Examiner has failed to meet his burden of proof under MPEP 2143 to present a *prima facie* case of obviousness.

Claim 2 depends from claim 1 and further limits an element of the claimed "XML mapping tree". Though the Examiner suggests that the alleged combination has an "attribute" associated with the DTD of Cheng, the claim requires limitation of the claimed "XML mapping tree". Surely the Examiner can distinguish between and element of the DTD of Cheng and the claimed element of the "XML mapping tree". The alleged combination cannot meet this limitation because it does not have an "XML mapping tree". As explained above, it does not have an "XML mapping tree" because it does not store data, received in the form of an XML message into a data base which does not store XML messages. The rejection of claim 2 is respectfully traversed.

Claim 3 depends from claim 2 and is further limited by transferring the DTD from the "user terminal" to the "data base management system". The Examiner finding in support of his rejection is clearly erroneous. Walsh states at column 9, lines 52-53:

As shown in FIG. 2, the primary purpose of the design tools 140 is to generate 141 XML document type definitions (DTD) 142....

The DTD is transferred to the browser in Walsh, rather than from the user terminal as claimed by Applicants. Surely, the Examiner can appreciate this distinction, because Applicants' approach permits the user to define a format, whereas Walsh requires the user to comply with a predefined format. The rejection of claim 3 is respectfully traversed.

Claim 4 depends from claim 3 and is further limited by "internal storage of the XML element tree". As has been explained above in detail, the alleged combination has no "XML element tree". Therefore, it is not illogical that the alleged combination has no facility for storing that which it does not have. The rejection of claim 4 is respectfully traversed.

Claim 5 depends from claim 4 and is further limited by "wherein said DTD location path is displayed on said user terminal as a window". As if to confuse the matter, the Examiner cites Cheng, column 8, lines 23-26, which says nothing of "DTD", nothing of "DTD location path", nothing of "display", nothing of "user terminal" and nothing of a "window. It is hard to contemplate a citation which would be more irrelevant to the Examiner's rejection. The rejection of claim 5 is respectfully traversed as making no sense.

Claim 6 is an independent apparatus claim having five basic elements. The alleged combination has none of these elements. However, the fifth element is clearly not found within the

alleged combination, because it has no need for the claimed "XML mapping tree". The claimed "XML mapping tree" is not required in Cheng, because Cheng handles only XML documents. Cheng accesses, transfers and stores data as XML documents. No conversion of the XML messages are needed. Therefore, Cheng has no use for the claimed "XML mapping tree".

Similarly, Walsh has no need for the claimed "XML mapping tree", because Walsh supplies the format of the XML messages to the user in the form of a DTD. Unlike Applicants' system, the users of Walsh are not free to define their own formats, but must instead utilize the DTD's generated by Design Tools 140 (see Walsh Figs. 1b and 2). The rejection of claim 6, and all claims depending therefrom, is respectfully traversed.

Claim 7 depends from claim 6 and further limits the claimed "XML mapping tree". The alleged combination has no "XML mapping tree" for the reasons explained above. Therefore, it has no such further limitations of the claimed "XML mapping tree". The rejection of claim 7 is respectfully traversed.

Claim 8 depends from claim 7 and further limits the claimed "XML document". As explained above, the alleged combination does not have the limitations of claim 7 from which claim 8 depends. Therefore, the alleged combination cannot have the further limitations of claim 8. The rejection of claim 8 is respectfully traversed.

Claim 9 depends from claim 8 and further limits the claimed "XML mapping tree". The alleged combination has no "XML mapping tree" for the reasons explained above. Therefore, it has no such further limitations of the claimed "XML mapping tree". The rejection of claim 9 is respectfully traversed.

Claim 10 depends from claim 9 and further limits the claimed "publicly accessible digital data communication network". As explained above, the alleged combination does not have the limitations of claim 9 from which claim 10 depends. Therefore, the alleged combination cannot have the further limitations of claim 10. The rejection of claim 10 is respectfully traversed.

Claim 11 is an independent method claim having three basic steps. The alleged combination does not have any of these steps. However, it is most apparent that the second and third steps, in particular, are not found in the alleged combination, because neither Cheng nor Walsh has any need of a source mapping tree. As explained in detail above, Cheng accesses and stores XML documents and so has no need of conversion. Walsh performs conversions in a different manner, because Walsh supplies the DTD to the users, rather than permitting the users to determine their own formats. The rejection of claim 11, and all claims depending therefrom, is respectfully traversed.

Claim 12 depends from claim 11 and further limits the handling of the claimed "XML mapping tree". As explained in detail above, the alleged combination does not have and does not

need the claimed "XML mapping tree". Therefore, the alleged combination cannot have the further limitations of claim 12. The rejection of claim 12 is respectfully traversed.

Claim 13 depends from claim 12 and further limits the handling of the claimed "XML mapping tree". As explained in detail above, the alleged combination does not have and does not need the claimed "XML mapping tree". Therefore, the alleged combination cannot have the further limitations of claim 13. The rejection of claim 13 is respectfully traversed.

Claim 14 depends from claim 13 and further limits the claimed "XML document". As explained above, the alleged combination does not have the limitations of claim 13 from which claim 14 depends. Therefore, the alleged combination cannot have the further limitations of claim 14. The rejection of claim 14 is respectfully traversed.

Claim 15 depends from claim 14 and further limits the claimed "publicly accessible digital data communication network". As explained above, the alleged combination does not have the limitations of claim 14 from which claim 15 depends. Therefore, the alleged combination cannot have the further limitations of claim 15. The rejection of claim 15 is respectfully traversed.

Claim 16 is an independent apparatus claim having "means-plus-function" limitations. Though the alleged combination has none of the four basic elements, it is most apparent that the alleged combination does not have the "composing means", because

neither Cheng, nor Walsh, nor the combination thereof, has the claims "XML mapping tree". The rejection of claim 16, and all claims depending therefrom, is respectfully traversed.

Claim 17 depends from claim 16 and further limits the claimed "composing means". As explained above, the alleged combination does not have the limitations of claim 16 from which claim 17 depends. Therefore, the alleged combination cannot have the further limitations of claim 17. The rejection of claim 17 is respectfully traversed.

Claim 18 depends from claim 17 and further limits the claimed "XML document". As explained above, the alleged combination does not have the limitations of claim 17 from which claim 18 depends. Therefore, the alleged combination cannot have the further limitations of claim 18. The rejection of claim 18 is respectfully traversed.

Claim 19 depends from claim 18 and further limits the claimed "transmitting means". As explained above, the alleged combination does not have the limitations of claim 18 from which claim 19 depends. Therefore, the alleged combination cannot have the further limitations of claim 19. The rejection of claim 19 is respectfully traversed.

Claim 20 depends from claim 19 and is further limited by the claimed "displaying means". As explained above, the alleged combination does not have the limitations of claim 19 from which claim 20 depends. Therefore, the alleged combination cannot have

the further limitations of claim 20. The rejection of claim 20 is respectfully traversed.

Claim 21 is an independent apparatus claim. Of the four major claim elements, it is most apparent that the fourth element (i.e., "XML mapping tree") is simply not found in the alleged combination. As explained above, neither Cheng nor Walsh nor the combination thereof has this claimed element, because it is not needed. The rejection of claim 21, and all claims depending therefrom, is respectfully traversed.

Claim 22 depends from claim 21 and is further limited in that the DTD is transferred from the user terminal to the claimed legacy data base management system. As explained above, anyone viewing Figs. 1b and 2 of Walsh readily understands that the DTD of Walsh is generated by Design Tools 140 and transferred to browser 124. To the extent that the Examiner reads Walsh differently, his findings are clearly erroneous. The rejection of claim 22 is respectfully traversed.

Claim 23 depends from claim 22 and is further limited by a "repository" which stores the claimed "XML mapping tree". The alleged combination does not have the claimed "repository", because the alleged combination does not have the claimed "XML mapping tree". The rejection of claim 23 is respectfully traversed.

Claim 24 depends from claim 23 and is further limited by "a window for display of the DTD on the user terminal". The alleged

combination shows not "windows" for any purpose. Furthermore, as if to confuse the matter, the Examiner cites a great deal of the disclosure of Walsh, which says nothing of the claimed "window". The rejection of claim 24 is respectfully traversed.

Claim 25 depends from claim 24 and further limits the claimed "publicly accessible digital data communication network". As explained above, the alleged combination does not have the limitations of claim 24 from which claim 25 depends. Therefore, the alleged combination cannot have the further limitations of claim 25. The rejection of claim 25 is respectfully traversed.

Claims 1-20 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Cheng in view of U.S. Patent No 6,721,727, issued to Chau et al. (hereinafter referred to as "Chau"). It is not understood whether claims 1-20 have been finally rejected on this grounds intentionally or as a result of a clerical mistake. However, Applicants have no alternative but to assume that the Examiner has intended to reject claims 1-20 on this ground of rejection. Therefore, the rejection of claims 1-20 is respectfully traversed for the reasons provided below.

This ground of rejection appears to underscore several logical, legal, and factual inconsistencies of the pending final rejection. For example, the Examiner states at paragraph 13:

Applicant's amendment necessitated the new ground(s) of rejection presented in this office action.

Apparently, this statement is incorrect, because the rejection of claims 1-20 under Cheng in view of Chau appears to be identical to the previous rejection before the amendment. As a result, one viewing the Examiner's action is compelled to note that Applicants' previous amendment has not appeared to necessitate any new ground of rejection.

Furthermore, even though paragraphs 3-7 of the Examiner's final action describes itself as "Response to Applicant' (sic) Remarks", nothing is said of Applicants' traversal of the rejection under Cheng in view of Chau. Instead the Examiner is solely concerned with his more recent conclusions based upon the alleged combination of Cheng with newly cited and applied Walsh. It is not understood whether the Examiner has acquiesced in view of Applicants' remarks concerning the alleged combination of Cheng and Chau, or whether the Examiner has not "carefully and thoroughly studied and reviewed Applicants' amendment of 12-22-2004".

Finally, the findings of fact with regard to the new rejection based upon the alleged combination of Cheng with Walsh are inconsistent with the finding of fact with regard to the previous rejection based upon the alleged combination of Cheng with Chau. It is respectfully submitted that the Examiner does not have authority to make contingent and inconsistent findings

of fact. For example, in paragraph 10c. the Examiner, in rejecting claim 1 under Cheng in view of Walsh, states:

Cheng et al. does not explicitly teach in a format incompatible with XML....

Yet, in rejecting claim 6 under Cheng in view of Chau the Examiner states:

....a data base management system having an input format different from XML (Cheng et al. Col. 14, lines 35-47).....

These findings are directly inconsistent. It is respectfully submitted that not only are such inconsistencies not permitted under controlling law, the technique is not helpful in furthering the efficient prosecution of pending claims.

However, under the assumption that the Examiner has intentionally rejected claims 1-20 under Cheng in view of Chau, Applicants herewith provide their response.

Cheng is dedicated to a technique for "Querying Structured Documents"¹. In other words, Cheng is concerned with providing an efficient way to search a data base containing XML documents. Fig. 1 of Cheng clearly shows that File System 500 specifically comprises XML documents. Though Cheng provides indexing and other techniques for searching the XML document data base, the data is entered, stored, searched, and queried as XML documents. Thus, Cheng has no interest in conversion between XML documents and other data formats because it only handles XML documents.

¹See Title.

Chau is also dedicated to showing how to construct and search a relational data base containing XML documents. This is apparent from the title, "XML DOCUMENT STORED AS COLUMN DATA", and from the abstract which begins:

A technique is provided for creating metadata for fast search of XML documents stored as column data.

That means that Chau's attention is limited to storing data from an XML message into the relational data base and retrieving data from that relational data base for packing into an XML message. In other words, Chau is limited to transferring data from the XML message to the relational data base and transferring data from the relational data base to an XML message. The important thing, however, is that Chau has no interest in conversion between XML and other formats. Chau receives data in XML document format, stores data in XML document format, searches data in XML document format, and communicates in XML document format.

Applicants' invention, on the other hand, provides a technique for transferring XML documents from a user terminal to a legacy data base management system for storage in a legacy data base which is not compatible with XML format. This of necessity means that a conversion is required. Applicants describe the Field of the Invention (see specification at page 1, lines 11-13) as:

The present invention generally relates to data base management systems and more particularly relates to enhancements for providing an interface between a

legacy data base management system and Internet servers employing XML (extensible markup language) protocol

The initiating transfer between a user and a legacy data base management system involves the transfer of an XML document. This XML document cannot be entered into the legacy data base by definition because the legacy data base does not accept XML documents.

As a result conversion of the XML document to data which can be stored in the legacy data base is required by Applicants' preferred embodiments and is limiting of all pending claims. Additional claim limitations specify certain structural aspects of this conversion process.

Thus, both Cheng and Chau search data bases of XML documents whereas Applicants must convert XML documents generated by the user terminal into a format suitable for storage within the legacy data base.

Though the Examiner has surprisingly found most of the limitations of the pending claims to be in Cheng, he does admit:

Cheng et al. does not explicitly teach publically accessible digital data communication network.

This conclusion is readily apparent from the disclosure of Cheng, which not only does not have a "publically accessible digital data communication network", it has no network at all. In fact, the preferred embodiment of Cheng is all implemented within a single computer. This is clearly shown in Fig. 7 as Computer System 702, with Fig. 7 described at column 4, lines 46-47:

FIG. 7 is an exemplary computer hardware environment for use in accordance with the present invention.

Cheng prefers to completely practice its invention within a single computer. Thus, it is unthinkable that one reading Cheng would be motivated to incorporate a "publically accessible digital data communication network" in the system of Cheng.

Nevertheless, the Examiner states:

Chau et al. teaches publically accessible digital data communication network) (i.e. Internet) (Chau et al. col. 4, lines 10-23). Therefore, it would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified Chang et al. wherein the network is publically accessible digital data communication network.

In other words, because Applicants have such a network, it is obvious for Cheng to have one, even though Cheng does not appear to see the need for any network. This is precisely the unsupported conclusion attacked by the Court of Appeals for the Federal Circuit stating in part:

Broad conclusory statements regarding the teaching of multiple references, standing alone, are not "evidence". *In re Dembiczak*, 175 F.3d 994, 50 U.S.P.Q. 2d 1614 (Fed. Cir. 1999).

The Examiner continues:

It would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified Cheng et al. by the teaching of Chau et al. because providing the publically accessible digital data communication network allows the improved technique of selecting, retrieving, and storing relational data into XML documents as taught by Chau et al. (Chau et al. col. 2, lines 36 to 38).

Not only is this statement clearly erroneous as a matter of fact and incorrect as a matter of law, it makes no sense. Cheng already performs "selecting, retrieving, and storing relation data into XML documents" (see Fig. 7, for example). Furthermore, Cheng accomplishes these tasks within a single computer (i.e., Computer System 702) without the need for any network at all.

The Examiner has failed to show motivation as required by MPEP 2143. In addition, the Examiner has not even addressed his obligation to show reasonable likelihood of success. He has not even explained where it would be obvious to connect the Internet to the system of Fig. 7. Having failed in the first two showings, the Examiner also fails to show all of the claim elements within the alleged combination.

Specifically, with regard to claim 1, the Examiner states:

As to claim 1, Cheng et al. discloses a data processing system having a user terminal coupled to a data hale (sic) management system via a publically accessible digital data communication network....

This finding is clearly erroneous: Cheng has no separate "user terminal" and "data base management system". As explained above, Fig. 7 of Cheng clearly shows all of the functionality within a single computer, Computer System 702. To further assist the Examiner, claim 1 has been amended to indicate that the data base management system has a data base which is not compatible with the XML format. Cheng certainly does not have this feature.

Element a of the improvement requires that the XML document be generated by the user terminal and transferred to the data base management system over the network. Cheng has no user terminal and has no network. Cheng cannot meet this claim element.

Element b of the improvement, as amended, requires that the DTD be transferred from the user terminal to the data base management system. Again, Cheng cannot meet this limitation.

The XML mapping tree of element c, as amended, provides for disassembly of the XML document for storage in the legacy data base. The Examiner does not address this limitation but rather is concerned with "parse the DTD" to "store DTD data into the XML_DTD_REF table". This finding is both clearly erroneous and legally irrelevant.

Having failed to make any of the three showings required by MPEP 2143, the rejection of claim 1, and all claims depending therefrom, is respectfully traversed.

Claim 2 depends from claim 1 and further limits the "plurality of elements" of the XML document. The Examiner again refuses to address the claim limitation. Therefore, the rejection is legally irrelevant. The rejection of claim 2 is respectfully traversed.

Claim 3 depends from claim 2 and further requires transfer of the DTD from the user terminal to the data base management system. The Examiner ignores this limitation and cites Cheng,

column 14, lines 35-47, which has nothing to do with transfer of the DTD. The rejection of claim 3 is respectfully traversed.

Claim 4 depends from claim 3 and is further limited by storage for the XML mapping tree. Instead of addressing the actual limitation, the Examiner states that "...the DTD is stored for future use...". This finding is both clearly erroneous and legally irrelevant. The rejection of claim 4 is respectfully traversed.

Claim 5 depends from claim 4 and is further limited by a window which displays the DTD location path on the user terminal. Cheng has no user terminal, no window, and no DTD location path. Therefore, the Examiner supports his rejection with a clearly erroneous finding of fact and a legally irrelevant citation. The rejection of claim 5 is respectfully traversed.

Claim 6 is an independent apparatus claim having five elements. Cheng does not have element c, as admitted by the Examiner. Cheng also does not have elements d or e. The Examiner's attention is again directed to Fig. 1 wherein the data base of Cheng is specifically XML documents. The rejection of claim 6, and all claims depending therefrom, is respectfully traversed.

Claim 7 depends from claim 6 and is further limiting of the XML mapping tree. The alleged combination has no XML mapping tree. The rejection of claim 7 is respectfully traversed.

Claim 8 depends from claim 7. The alleged combination does not have the limitations of claim 6 or 7. Therefore, it cannot have the combination with the unique additional limitations of claim 8. The rejection of claim 8 is respectfully traversed.

Claim 9 depends from claim 8 and is further limited by the data base management system receiving the DTD. The alleged combination cannot meet this limitation as discussed above. The rejection of claim 9 is respectfully traversed.

Claim 10 depends from claim 9. The alleged combination does not have the limitations of the claims from which it depends. Therefore, the alleged combination cannot meet the unique limitations of claim 10. The rejection of claim 10 is respectfully traversed.

Claim 11 is an independent method claim having three steps. The Examiner begins his rejection with the clearly erroneous statement:

As to claim 11, Cheng et al. as modified teaches a method of interfacing an XML document to a data base management system having an incompatible input protocol.

This finding is clearly erroneous because the entire system of Cheng is compatible with XML documents (See Fig. 1).

Cheng has no "transferring" step as all of the functionality is within the single computer, Computer System 702. The second step requires "parsing of the XML document". Because the alleged combination does not have this step, the Examiner states that

Cheng "parses the DTD". Surely, the Examiner can appreciate the distinction. The third step requires processing of the parsed XML document. The alleged combination may have a parsed DTD, but it clearly has no parsed XML document. As a result, the alleged combination has none of the three claimed steps. The rejection of claim 11, and all claims depending therefrom, is respectfully traversed.

Claim 12 depends from claim 11 and requires the further step of storing the XML element tree. The alleged combination does not meet this limitation. Therefore, the Examiner alleges that Cheng stores the DTD data. Surely the Examiner can distinguish. The rejection of claim 12 is respectfully traversed.

Claim 13 depends from claim 12 and is further limited by retrieval of the stored XML element tree. The alleged combination has no XML element tree; cannot store the XML element tree (because it has none); and therefore, cannot retrieve the XML element tree. The rejection of claim 13 is respectfully traversed.

Claim 14 depends from claim 13 and contains additional unique limitations. The alleged combination does not have the elements of the claims from which it depends. Therefore, the alleged combination cannot meet the unique limitations of claim 14. The rejection of claim 14 is respectfully traversed.

Claim 15 depends from claim 14 and contains additional unique limitations. The alleged combination does not have the

elements of the claims from which it depends. Therefore, the alleged combination cannot meet the unique limitations of claim 15. The rejection of claim 15 is respectfully traversed.

Claim 16 is an independent apparatus claim having four "means-plus-function" claim elements. As such, it is to be examined in accordance with MPEP 2181 et seq. Though Chau off-handedly mentions the Internet at the cited column 5, lines 50-52, it says nothing of the claim limitation of "means for transmitting an XML document". The alleged combination does not have a "means for providing data base management services". The alleged combination has no "composing means". Both Cheng and Chau handle, store, and retrieve only XML documents. Therefore, the rejection of claim 16, and all claims depending therefrom, is respectfully traversed.

Claim 17, as amended, depends from claim 16 and is further limited by "storing means for storing the parsed XML document". The alleged combination does not have this element and the Examiner does not suggest that it does. The rejection of claim 17 is respectfully traversed.

Claim 18 depends from claim 17 and is further limited by details of the XML document. The alleged combination does not have the limitations of the claims from which claim 18 depends. Therefore, the alleged combination cannot have the unique combination of claim 18. The rejection of claim 18 is respectfully traversed.

Claim 19 depends from claim 18 and further limits the "transmitting means". The alleged combination does not have the "transmitting means" as claimed. Therefore, it does not have the further limitations of claim 19. The rejection of claim 19 is respectfully traversed.

Claim 20 depending from claim 19 and adds the further limitation of the "displaying means for displaying a pathway for said DTD storage location". The alleged combination does not have these elements. The rejection of claim 20 is respectfully traversed.

Having thus responded to each objection and ground of rejection, Applicants respectfully request entry of this amendment and allowance of claims 1-25, being the only pending claims.

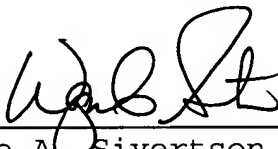
Please charge any deficiencies or credit any overpayment to Deposit Account No. 14-0620.

Respectfully submitted,

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By his attorney,

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